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Attorneys for Plaintiffs My Left Foot Children's Therapy,
LLC, Jon Gottlieb, and Ann Marie Gottlieb

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEVADA

MY LEFT FOOT CHILDREN'S
THERAPY, LLC; JON GOTTLIEB AND
ANN MARIE GOTTLIEB,

Plaintiffs,

v.

CERTAIN UNDERWRITERS AT
LLOYD'S LONDON SUBSCRIBING TO
POLICY NO. HAH15-0632,

Defendant.

Case No. 2:15-cv-01746- MMD- VCF

**JOINT STIPULATION TO EXTEND
MOTION FOR SUMMARY JUDGMENT
DATES**

Plaintiffs My Left Foot Children's Therapy Services LLC, Jon Gottlieb, and Ann Marie
Gottlieb ("Plaintiffs") and Defendant Underwriters at Lloyd's London Subscribing to Policy No.
HAH15-0632 ("Defendant") (together with Plaintiffs, the "parties") jointly submit this Stipulation to
modify the briefing schedule on Defendant's Motions for Partial Summary Judgment (Dkt. 151 and
Dkt. 152):

1 WHEREAS, on June 9, 2020, Plaintiffs noticed two depositions: (i) a deposition pursuant to
2 Federal Rule of Civil Procedure 30(b)(6) for Defendant to occur on July 17, 2020; and (ii) the 30(b)(1)
3 deposition of Mr. Paul Bailey, to occur on July 16, 2020 (together, the “Depositions”);

4 WHEREAS, after receiving the deposition notices, Mr. Barry Chasnoff, lead Counsel for
5 Defendant, informed Plaintiffs’ counsel that he is scheduled to be on vacation and unavailable during
6 the month of July;

7 WHEREAS, Plaintiffs agreed to reschedule the Depositions for the first two weeks in August
8 to accommodate Mr. Chasnoff’s schedule;

9 WHEREAS, on June 22, 2020, Defendant filed two motions for partial summary judgment
10 (Dkt. 151 and Dkt. 152) (the “Motions”), which were accompanied by Declarations signed by Mr.
11 Bailey and another witness, Carolyn Worster;

12 WHEREAS, the current deadline for Plaintiffs to respond to the Motions is July 13, 2020,
13 which is before the planned Depositions;

14 WHEREAS, counsel for Defendant has agreed to set a briefing schedule on the Motions so that
15 Plaintiffs may have the opportunity to depose Mr. Bailey, Ms. Worster, and/or a 30(b)(6) witness, as
16 needed, before filing responses to the Motions;

17 WHEREAS, Mr. Nicholas Gregory was previously the lead associate working on this case on
18 behalf of Plaintiffs, but is no longer employed at Akin Gump Strauss Hauer & Feld, LLP;

19 WHEREAS, Ms. Erin Brewer will now be the lead associate working on this case on behalf of
20 Plaintiffs, and will be filing a motion for admission *pro hac vice* and notice of appearance in this
21 matter this week. Ms. Brewer is an attorney licensed in the State of Texas, and has an application
22 pending for admission to the California Bar. Ms. Brewer is scheduled to take the California Bar
23 examination on September 9-10, 2020, and is scheduled to be on bar study leave from August 10-
24 September 10, 2020;

25 WHEREAS, Mr. Shawn Hanson, lead counsel for Plaintiffs is scheduled to be on vacation
26 during the latter half of the month of August;

27 NOW, THEREFORE,

28 The parties request that the Court enter an order setting a briefing schedule on the Motions as

follows:

1. Plaintiff's oppositions to the Motions shall be filed no later than September 18, 2020; and
2. Defendant's replies shall be filed no later than October 2, 2020.

Respectfully Submitted,

AKIN GUMP STRAUSS HAUER & FELD MARQUIS AURBACH COFFING
LLP

By: /s/ Shawn Hanson
Shawn Hanson, Esq.
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By: /s/ Barry A. Chasnoff
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Attorney for Defendant

IT IS SO ORDERED.



MIRANDA M. DU
UNITED STATES DISTRICT JUDGE

Date: June 25, 2020

I, Shawn Hanson, attest that all other signatories listed above, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

Dated: June 25, 2020

/s/ Shawn Hanson

Shawn Hanson

CERTIFICATE OF SERVICE

I am employed in the County of San Francisco, State of California. I am over the age of 18 and not a party to the within action; my business address is: 580 California Street, Suite 1500, San Francisco, California 94104. On June 25, 2020, I served the foregoing documents on the interested parties below, using the following means:

All parties identified for Notice of Electronic Filing generated by the Court's CM/ECF system under the above-referenced case caption and number

BY ELECTRONIC MAIL OR ELECTRONIC TRANSMISSION: Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the document to be sent to the respective e-mail addresses of the parties as stated above.

I declare that I am employed in the office of a member of this Court at whose direction the service was made. I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 25, 2020, at San Francisco, California.

Lorraine Franco-Gorn

Lorraine France-Gorn